

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

TASHICA FULTON-GREEN, and §
DANIEL CREVAK, on behalf of §
themselves and all others similarly situated, §
Plaintiffs, §

v. §

ACCOLADE, INC., §
Defendant. §
_____ §
§

Civil Action No.: 2:18-cv-00274-GEKP

**PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Plaintiffs, through their undersigned counsel, respectfully file this Motion for Final Approval of Class Action Settlement, and move the Court to enter the proposed Final Approval Order:

1. finally certifying the Settlement Class¹ pursuant to Federal Rules of Civil Procedure 23(a) and 23(b);
2. finally approving the Settlement of this action as fair, reasonable, and adequate pursuant to Rule 23(e);
3. finally appointing Plaintiffs as Settlement Class Representatives of the Settlement Class;
4. finally appointing Charles E. Schaffer of Levin Sedran & Berman, Bruce Steckler of Steckler Gresham Cochran PLLC, and John A. Yanchunis of Morgan & Morgan Complex Litigation Group. as “Class Counsel” for the Settlement Class;

¹ Unless otherwise defined, capitalized terms have the same meaning attributed to them in the Settlement Agreement (“SA”), previously filed at ECF No. 20-1, and as amended at ECF No. 26-1, and/or in the Memorandum filed in support of this motion.

5. finally appointing Epiq Systems, Inc. to serve as the Settlement Administrator, and Rodney Max as the Claims Referee;
6. finding that the Notice Program satisfied Rule 23 and due process; and
7. entering, in substantially similar form to Exhibit E of the Settlement Agreement (ECF. No. 20-6), the proposed Final Approval Order and dismissing this case.

This Motion is based on the accompanying Memorandum of Law; the accompanying Declaration of Cameron Azari on behalf of Epiq, the declaration of John Yanchunis filed in support of this motion, and the Declarations of Class Counsel previously filed with the Court in connection with Plaintiffs' Motion for Preliminary Approval, and all other records, pleadings and papers on file in this matter. Pursuant to the terms of the Settlement Agreement, Defendant does not oppose this Motion.

Dated: June 24, 2019

Respectfully submitted,

s/ Charles E. Schaffer

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*Counsel for Plaintiffs and the Proposed Settlement
Class*

CERTIFICATE OF UNCONTESTED MOTION

I hereby certify that this motion is uncontested and filed in accordance with the terms of the Parties' Settlement.

/s/ Charles E. Schaffer
Charles E. Schaffer